

EXHIBIT 1

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re:

Case No. No. 23-40523 WJL

THE ROMAN CATHOLIC BISHOP OF
OAKLAND, a California corporation sole,

Chapter 11

Debtor

**[PROPOSED] ORDER GRANTING
MOVING INSURERS' MOTION FOR
ENTRY OF AN ORDER PERMITTING
INSURER EXPERTS AND/OR
CONSULTANTS TO HAVE ACCESS
TO SEXUAL ABUSE PROOFS OF
CLAIMS AND SUPPLEMENTS¹**

¹ Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to them in the Motion.

1 **THIS MATTER** having been brought before the Court upon the motion (the “Motion”) of
2 the Moving Insurers, by and through their counsel, for entry of an order designating as Authorized
3 Parties under the Bar Date Order the experts and consultants of the insurers, so that such additional
4 parties may receive and review Proofs of Claim in accordance therewith; and due notice having
5 been properly provided; and the Court having considered the papers and arguments submitted by
6 counsel; and the Court having overruled in part and granted in part the objections to the Motion;
7 for the reasons stated on the record on December 1, 2023,

8 **IT IS HEREBY ORDERED THAT:**

9 1. The Motion is hereby GRANTED in part and DENIED in part.
10 2. Experts of the insurers who are defendants in the Adversary Proceedings, including
11 the California Insurance Guarantee Association (“CIGA”), who sign the Authorized Party
12 Confidentiality Agreement exhibited to the Bar Date Order, are hereby deemed to be Authorized
13 Parties under Section 14(iii)(j) of the Bar Date Order, and are entitled to access and review the
14 Proofs of Claim upon the Court’s entry of this Order provided that each claimant’s name, address,
15 email address, telephone number(s), Social Security Number, jail or prison number (if applicable),
16 and month of birth (collectively “PII”) on the proofs of claim is redacted. For the purposes of this
17 order PII shall not include a claimant’s year of birth.

18 3. “Expert” shall mean an entity or person with specialized knowledge or experience
19 in a matter pertinent to the Chapter 11 Case and/or Adversary Proceedings who has been retained
20 by a Authorized Party or its counsel to serve as an expert witness or as a consultant in connection
21 with this Chapter 11 Case and/or Adversary Proceedings, including but not limited to Brattle Group
22 and NERA Economic Consulting. For purposes of this Order, the Insurance Services Office or
23 ISO, or such any other such claims database provided to third parties, shall not be an “Expert.”

24 4. This Order is entered without prejudice to the Debtor’s insurers subsequently
25 moving for authorization to provide Experts with unredacted copies of the proofs of claim.

26 5. The Committee shall provide the insurers with a service list of counsel for the
27 claimants who have filed proofs of claim so that they have such information so that they can serve
28 them with a motion for authorization to provide Experts with unredacted copies of the proofs of

1 claim.

2 6. The Court shall retain jurisdiction to hear and determine all matters arising from or
3 related to the implementation of this Order.

4 **END OF ORDER*

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